

Application No. 10/626,856  
Amd. dated July 3, 2006  
Reply to February 21, 2006 Communication

Docket No. D/A3052-311290

### REMARKS

Claims 1-37 are pending. Claims 1, 31 and 35 are amended for clarifications purposes without prejudice or disclaimer. No new matter is added. Reconsideration in view of the following remarks is respectfully requested.

Applicants thank Assistant Examiner Lovel and Primary Examiner Pham for the courtesies extended to Applicants' representative Christian Austin-Hollands during the June 29, 2006 personal interview. During the interview, the examiners agreed that amending claims 1, 31 and 35 to recite "outputting" would overcome the 101 rejections. Applicants representative explained the invention and distinctions over the art of record. The substance of the interview is incorporated into these remarks.

The Communication rejects claims 1-15, 31 and 33-37 under 35 U.S.C. § 101. This rejection is respectfully traversed. Independent claim 1 is directed to a computer-implemented method for outputting new events and therefore recites subject matter. Independent claims 31-32 recite outputting new event indicators and are therefore statutory. Claims 33-34 and 37 depend from independent claim 1 and therefore also recite statutory subject matter. Claim 35 recites outputting an indicator and is therefore statutory subject matter and claim 36 depends from claim 35 and therefore defines patentable subject for the same reasons. Thus, Applicants respectfully request the withdrawal of the 35 U.S.C. § 101 rejection of claims 1-15, 31 and 33-37.

The Communication rejects claims 1-2, 7-17, 22-32, and 37 under 35 U.S.C. § 103(a) based on "Topic Detection and Tracking Pilot Study Final Report" by James Allan et al. (hereafter Allan1) in various combinations with "Relevance Models for Topic Detection and Tracking" by V. Lavrenko et al., (hereafter Lavrenko), "On-Line New Event

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Detection and Tracking” by J. Allan et al. (hereafter Allen2) and to U.S. Patent No. 6,584,220 (hereafter Lantrip).

Allan, is a survey of the Topic Detection and Tracking Pilot Study sponsored by DARPA that ran September 1996 through October 1997 and which included DARPA, Carnegie Mellon University, Dragon Systems and the University of Massachusetts at Amherst. (See for example Allan, page 1, col. 1, lines 9-12). The Allan paper describes the major tasks to be performed and the approaches used by the various participants’ in the study. (See for example, Allan, page 1, col. 2, lines 22-30. Thus, Section 2.2, is entitled “Dragon Approach” indicating the approach taken by Dragon systems to solving problems presented during the study. Similarly, Section 2.3 is entitled “UMass Approach” and Section 2.4 “CMU Approach”. Although each embodiment appears in the same reference, the cross-combination of elements from the three discrete embodiments described in Allan reference would require a motivation to combine each approach which is simply ignored in the Communication.

Moreover, even assuming that the UMass and CMU approaches could be combined, which applicants respectfully submit cannot properly be done, motivation must be shown as to why one of ordinary skill in the art would combine each of the asserted UMass/CMU combinations with Lavrenko.

The asserted combination also fails to disclose, teach or even suggest at least the features directed to: 1) determining at least one story characteristic based on at least one of: an average story similarity story characteristic and a same event-same source story characteristic; 2) determining a source-identified story corpus, each story associated with at least one event; 3) determining a source-identified new story associated

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with at least one event; 4) determining story-pairs based on the source-identified new-story and each story in the source-identified story corpus; 5) determining at least one inter-story similarity metric for the story-pairs; 6) determining at least one adjustment to the inter-story similarity metrics based on at least one story characteristic; and 7) determining a new story event indicator if the event associated with the new story is similar to the events associated with the source-identified story corpus based on the inter-story similarity metrics and the adjustments, as recited in independent claim 1 and similarly recited in independent claims 16, 31 and 32.

The Communication at page 7, lines 4-6 asserts that Allan1 teaches “a same-event-same source story characteristic see Section 3.1: Detection Evaluation: lines 34-44)”. However, this background portion of the Allan1 reference describes the use of clusters. See for example, lines 43-45 describing how “[t]he degree of match between an event and a cluster is defined to be the number of stories that belong to both the event and the cluster. Also, the asserted combination fails to address at least the features directed to same event-same source as recited in independent claim 1.

The Communication at page 7, lines 7-10, asserts that the background description of the Corpus and the Evaluation Section 2.1 address the features of the claims directed to 2) determining a source-identified story corpus, each story associated with at least one event.

However, Applicants respectfully submit that these portions of the Allan1 reference must be read in context. Section 1.2 describes the Corpus indicates the “stories in this corpus are arranged in chronological order, are structured in SGML format, and are available from the Linguistic Data Consortium (LDC). (See for example, Allan, page 1, lines

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31-38) Although approximately 50% of the stories are drawn from CNN and 50% from Reuters, there is no teaching that the stories are source-identified. Allan1, at for example, Section 2.1 describes the segmentation task and notes that “[f]or the segmentation task, all of the TDT study corpus will be reserved for evaluations purposes. This means that any material to be used for training the segmentation system must come from sources other than the TDT study corpus.” Thus, Allan1 does not disclose, teach or even suggest the features directed to source-identified stories as recited in independent claim 1 and similarly recited in independent claims 6, 31, 32 and 35.

The Communication asserts that the various approaches discussed in Allan1, when combined with Lavrenko and Allan2 meet the features of dependent claims 4, 6 and 19, 21.

Although Lantrip discloses an interesting 3 dimensional display for a document set, it fails to remedy any of the deficiencies of the Allan1-Lavrenko combination. In particular, Applicants note that Lantrip Fig.6, described as a block diagram presenting the sequence steps, indicates in element 606-610 that distances to the centroids are calculated. Thus, Lantrip, even if properly combined with Allan1 and Lavrenko, the combination also fails to remedy the above-described deficiencies.

The Communication asserts that Allan1 and Lavrenko when combined with Allan2 address the features of claims 6 and 21. However, Allan2 also fails to disclose, teach or even suggest how to remedy the deficiencies of the Allan1-Lavrenko and/or Lantrip combinations as discussed above. Thus, independent claims 1, 16, 31, 32, 35 and 37 define patent subject matter over Allan1, Lavrenko, Lantrip and Allan2 either alone or in combination. Applicants therefore respectfully request the withdrawal of the 35 U.S.C. 103(a) rejections of claims 1-37.

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The Communication rejects claims 33-36 under 35 U.S.C. § 102(a) over Lavrenko. As discussed above, Lavrenko fails to address at least the features of 1) determining at least one story characteristic based on at least one of: an average story similarity story characteristic and a same event-same source story characteristic; 2) determining a source-identified story corpus, each story associated with at least one event; 3) determining a source-identified new story associated with at least one event; 4) determining story-pairs based on the source-identified new-story and each story in the source-identified story corpus; 5) determining at least one inter-story similarity metric for the story-pairs; 6) determining at least one adjustment to the inter-story similarity metrics based on at least one story characteristic; and 7) determining a new story event indicator if the event associated with the new story is similar to the events associated with the source-identified story corpus based on the inter-story similarity metrics and the adjustments, as recited in independent claim 1 and similarly recited in independent claim 35. Claims 33-34 and 36 depend from claims 1 and 35 and define patentable subject matter for at least the same reasons. Applicants therefore request the withdrawal of the 35 U.S.C § 102(a) rejection of claims 33-34 and 35-36.

Applicants' respectfully submit this application is in condition for allowance. Favorable consideration and prompt allowance are earnestly solicited. However, should the Examiner believe anything further is desirable in order to place this application in even better condition for

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allowance; the Examiner is invited to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,



Christian Austin-Hollands  
Reg. No. 46,527

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CHRISTIAN AUSTIN-HOLLANDS  
P.O. Box 170325  
San Francisco, CA 94117  
Telephone: (415) 762.9543

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